

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA    )  
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JOHNNY REID EDWARDS         )

No. 1:11-CR-161

**JOHN EDWARDS' MOTION FOR  
"RE/PA/ROTT/SCRUSHY" TYPE INQUIRY**

John Edwards respectfully requests that the Court inquire into potential collaboration and coordination between Andrew Young, the Government's cooperating witness, and the Department of Justice, concerning private civil litigation and this criminal case, and to take appropriate action based on the results of such inquiry. *See Rea v. United States*, 350 U.S. 214, 217 (1956); *United States v. Scrushy*, 366 F. Supp. 2d 1134, 1136 (N.D. Ala. 2005); *United States v. Parrott*, 248 F. Supp. 196, 199 (D.D.C. 1965). An inquiry into this matter is warranted to ensure the proper administration of justice. At a minimum, such an inquiry would include the gathering of documentary materials and testimony from the individuals involved in the events in question. In further support of this motion, Mr. Edwards relies on the events and exhibits discussed in his sealed memorandum.

Prior to filing this motion, the undersigned addressed these issues with counsel for the Government. The parties were not able to reach any agreement with respect to the issues raised herein.

**WHEREFORE**, John Edwards respectfully requests that the Court initiate an inquiry into the events in question and take appropriate action thereafter.

This the 16th day of March, 2012.

/s/ Abbe David Lowell, *pro hac vice*

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### **CERTIFICATE OF SERVICE**

This is to certify that the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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*United States Department of Justice*

This the 16th day of March, 2012.

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